



**KAURI
FINANCE**
CRYPTO PLATFORM

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KAURIFINANCE OÜ

Narva mnt 7B, 10117 Tallinn, Estonia
Triumph Plaza, office 519
Registry code: 14559136
License #FVT000328

CODE OF CONDUCT

Last review: March 2021



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Registry code: 14559136
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1. GOAL, MISSION AND CORE VALUES

COMPANY'S GOAL

KAURIFINANCE OÜ is a virtual currency exchange service provider who, in its own economic or professional activity, accepts an order for exchanging virtual currency through an electronic platform and exchanges it for money. KAURIFINANCE OÜ is not an exchange or a regulated market. KAURIFINANCE OÜ does not offer cash-related services

In Kaurifinance OU (hereinafter the “Company”) we work together to find a balanced, innovative, market-driven solution in _____ business that best meets global challenges.

COMPANY'S MISSION

Our mission is to enhance the Company's value for our shareholders by transforming the present and creating the future using digital technologies.

Our slogan is: “ _____ ”.

CORE VALUES

Our core values are the cornerstones on which the idea of who we are and what we strive for is built.

➤ **Mutual respect and support**

We treat our employees and all our partners with professionalism, dignity and respect, creating an environment where people can work together make changes and become better. We appreciate and respect our employees, give them full support and are ready to assist their initiative and career growth.

➤ **Occupational safety and health**

We share personal and professional commitment to protect the safety and health of our employees, contractors, our customers, and all the people around us.

➤ **High ethical standards of behaviour**

We conduct ourselves and conduct business in accordance with the highest ethical standards and in accordance with all applicable laws, striving to always be a world-respected socially responsible company.



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2. DUTIES AND VIOLATIONS

2.1. Employee responsibilities

All Company's employees, are entrusted with ensuring that the Company's operations are conducted on the basis of the principles of responsible business conduct.

2.2. General requirements

As part of the general requirements, each employee must:

- Demonstrate commitment to Company's Core Values in their daily professional activities.
- Know the provisions of this Code of Conduct, as well as the policies and procedures adopted by the Company.
- Comply with laws, regulations and corporate policies applicable to the Company and the country in which this employee works. Under no circumstances is it allowed to conceal the fact that a person does not comply with the law, regulation or corporate policy or procedure.
- Never ask other persons and do not allow other persons, for example, external agents, representatives or suppliers, to perform actions that are not allowed to be performed by the Company.
- Cooperate and provide complete and accurate information when investigating violations.

2.3. Responsibilities concerning specific issues.

Employees must always comply with applicable laws, regulations, and corporate policies in the following areas:

- **Gifts and hospitality:** The exchange of gifts and participation in entertainment activities are allowed only in rare cases and only when such an action is not regarded as an inappropriate attempt to influence the business decision of the party involved. Acceptable level of the value of received and / or donated gifts cannot exceed EUR 200.
- **Bribes and "kickbacks":** never offer, do not hand, or accept payment or other benefits that may be regarded as improper or illegal.
- **Payment for goods and services:** Make sure that the Company's payments to third parties always appropriate and cannot be interpreted as illegal or suspicious.
- **International Business:** Employees must know the local rules for exporting and importing goods and services if any and be familiarize with the requirements for non-participation in boycotts operating in the countries where the goods, technologies or services are traded.
- **Personal data of customers, consumers, suppliers or other third parties:** Respect the privacy of customers, consumers and Company's suppliers, as well as other third parties, carefully protecting information about them and providing it exclusively to those authorized to receive such information. Company has special Confidentiality and Data



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Protection Policy which include the appropriated procedures to operate with such information.

- **Conflict of interest:** Report personal interests, which could potentially conflict with the interests of the Company, including, but not limited to, part-time work, other activities and financial interests, working with business information and its use, commercial opportunities available to the Company, as well as conflicts of interest affecting family members and other relationships personal nature. Make sure that personal donations for political campaigns and political activities do not affect the funds and other assets of the Company.
- **Company's assets.** Getting disposing, sharing or recycling Company's property, always remember the interests of shareholders, and in such a way that it is obvious that employees carefully protect the assets of the Company. These assets include, but are not limited to, computers and communication systems, proprietary information, intellectual property (for example, patents or inventions, brands, trademarks and copyrights), as well as expense reporti. Leaving Company, return all corporate property, including any confidential and internally written information.
- **Corporate Finance.** Use the Company's financial assets only for permitted purposes. Never ask for reimbursement of non-office expenses or for double reimbursement for the same costs. Apply measures to ensure that travel expenses reflect only official activities and are properly approved.
- **Corporate confidential information and information "For internal use only".** This type of special data identify in the Confidentiality and Data Protection Policy and protected from unauthorized transfer to non-Company.
- **Service time.** Do not use the Company's time to work on a third-party enterprise.
- **Debauchery, theft or extortion.** Never assign and redirect property or other assets owned by the Company or another person or company through fraud, deception or extortion.
- **Registration logs and reporting.** Properly create and manage Company's logs and reports using only validated data. In no case do not specify and do not allow other persons to indicate incorrect information in the Company's accounts.
- **Methods of competition.** Use only valid means of competition with other companies and developing relationships with customers and suppliers.
- **Collect information about competitors.** For collecting information about the Company's competitors, use only permissible methods and in no case stimulate theft or misrepresentation of the facts, and do not use other persons to collect this information with unacceptable means.



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- **Relations with governmental agencies.** If you are employee authorized to work with individuals representing government agencies, ensure that relationships with governmental officials are legitimate and meet the requirements imposed by the state (such requirements may be adherence to special procedures, availability of special certification, obtaining prior admission, etc.). Always take steps to ensure that your actions cannot be regarded as improper or containing conflicts of interest.
- **Contacts with third parties.** In case of receipt of written requests from third parties, such requests should go through the registration procedure and be reviewed only by authorized employees of the Company, depending on the nature of the issue.
- **Equality of opportunity and non-discrimination.** The Company provides all employees with equal opportunities for self-realization and career growth, regardless of their moral and religious beliefs, political affiliation, race, color gender, and sexual orientation, etc. The Company evaluates the contribution of each employee solely by assessing his\her professional and business skills and faithfully rewards for the work done and the successful execution of tasks. The Company appreciates the personal space of its employees and will not allow conflicts of any kind of intolerance to arise. Fair treatment of the Company's employees by the management is based on a cumulative assessment of the employee's contribution to the Company's business and is not equivalent to simple distributional equality. If you are authorized to make decisions on issues related to the Company's personnel, be guided by the qualifications and competence of the employees and avoid unacceptable and discriminational characteristics.
- **Privacy and personal information.** Demonstrate such respect for the personal information and property of others as you would expect for yourself.
- **Safety of life and health.** Always take precautions for ensuring safety of life and health.

2.4. Executive responsibilities

Management of the Company have a significant impact on the performance of their employees. As a rule, employees learn from their managers, whether specific actions in the framework of running a business are appropriate or inappropriate. Therefore, at all management levels a manager has the following additional responsibilities:

- Set high standards with individual actions.
- Regularly and clearly communicate to employees the principles of responsible business conduct and their correlation with Company's core values.
- Be fair to all employees. Also, help employees to understand that justice does not always mean that they are treated equally with all employees.
- Communicate to employees as a manager to help them resolve ethical issues and adherence to principles, or to hear reports of possible violations, so that they can contact manager without fear of retribution/chastisement.



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- Properly review employee reports of alleged irregularities.
- Respond appropriately to situations of conflict of interest in which employees are involved in order to ensure that business decisions are made entirely to serve the best interests of the Company.

These responsibilities are listed in this Code of Conduct so that all employees know what expectations the Company places on its managers.

2.5. Ethical violations

Ethical violations include several actions of employees related to the duties listed above and are subject to investigation by the Internal Audit department and reported to the CEO and Board of Directors.

Such violations include the following, but not limited to:

- Distortion official Company's reporting;
- Embezzlement;
- Theft;
- Conflict of interest;
- Bribery, extortion, or improper cash gifts;
- Inappropriate spending of Company's funds;
- Personal Abuse of Work Time;
- Conscious non-compliance with applicable laws or regulations;
- Attempts to hide non-compliance with a corporate procedure, standard or policy;
- Unauthorized disclosure of confidential information;
- Providing false information in official or internal investigations.

The presented classification of types of violations are not exhaustive and can be amended if necessary.

2.6. Bribes and kickbacks

Bribes and kickbacks are illegal in almost any country. Any offer of payment or anything of value in order to influence a business decision or the actions of state authorities can be regarded as a bribe or "kickback." In no case shall an employee of the Company offer, request, accept, or demonstrate willingness to accept such a payment. The employers should be careful, as some gifts not in the form of cash can also be regarded as a bribe (for example, expensive gifts over the company's established cost limits, certificates for expensive services, participation in prepaid entertainment events, etc.).

Unofficial payments to government officials, known as "facilitation payments" or "incentive payments", are prohibited.



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2.7. International business

Wherever the Company does business, there may be clear laws and regulations, as well as certain ways of doing business. We must follow local regulations, while ensuring compliance with Company's Core Values and the standards we have adopted. Therefore, each of the Company's employees must have an understanding of the relevant laws and regulations in order to ensure support for Company's reputation as a responsible international company.

2.8. Personal data of customers, consumers, suppliers and other third parties

The Company have certain obligations to protect personal data that the Company has in relation to its customers, consumers, suppliers and other third parties.

Employees who work with personal data of customers, consumers, suppliers and other third parties must understand the laws relating to the collection, transfer and use of such information. Depending on the type of information in some countries, significant restrictions apply to the way we work with personal data. In addition, the laws of a country, corporate principles and industry standards, require the use of security controls for the physical and electronic protection of personal data.

The above definition includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual

Personal data means any information relating to an identified or identifiable natural person (the "data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal data contain information that is sufficient for personal identification. Personal data may include the name of the customer, consumer, supplier or other third party, his date of birth, business or personal address, business or personal phone number, credit card number or personal registration number.

An international company – a company that has the counterparties in a variety of different jurisdictions and provides services that are needed to be regulated in different jurisdictions, the Company must comply with all applicable laws on privacy.

2.9. Ensuring sustainable growth for our shareholders

Ensuring sustainable growth for our shareholders means they receive a good permanent return on investment. In order to solve this difficult task and to comply with our Key Values, it is necessary for all of Company's employees to rationally use and protect the assets and resources of the Company, as well as to resolve any conflicts that threaten the interests of the Company.



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2.10. Conflict of interests

All employees must ensure that their personal activities and interests are not in conflict with their obligations to the Company. We should avoid even a hint of a conflict of interest.

A conflict of interest may include the following:

- Part-time work, external employment and other types of side activities
- Use of insider information and insider trading
- The use of official position
- Political activities or political campaign donations
- Substantive material interest of the employee either, according to an employee, a member of his/her family in a third-party enterprise entering into or seeking to enter into transactions with the Company or being its competitor.
- Receiving personal benefits to a family member of an employee (for example, from the Company's business partners) due to the position of the employee in the Company
- Any other events or circumstances, including family and other personal connections, that may force an employee to deviate from activities in the best interests of the Company.

Being in the head of a subordinate member of his family or entering into a romantic relationship with a subordinate is contrary to the policy of the Company. An employee facing such a situation should discuss the matter with their supervisor or with the HR Department.

Consideration of a potential conflict of interest

Management will examine whether an employee's personal interest can influence or create the likelihood of influencing the employee's responsibility to make business decisions, acting entirely in the best interests of the Company. The following factors should be considered:

- Does outside interest affect professional activities.
- Does it intersect with the functions, duties or location of an employee during work, or with the Company's commercial activities.
- Employee responsibilities include making or influencing business decisions in an area where a potential conflict may exist.
- Disclosure of a third-party interest may put the Company in an awkward position.
- The employee has access to internal information, potentially useful to a person who has an outside interest.
- A family member of an employee plays an active, managerial or decisive role within an outside interest where there is a potential conflict.



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Employees should discuss any issues related to a conflict of interest with their management, with the person responsible for compliance with corporate requirements, or with the Legal Department.

2.11. Family members or personal relationships

Close family members include children, stepchildren, parents, step-parents, spouse(s) and their brothers/sisters, brothers/sisters and their spouse(s), mother in law/other-in-law/father in law, aunt, uncle, and cousins (including adoptees, as well as their spouse(s)) and any other persons living together (not being tenants or employees). In some situations, a relationship with a non-family member may also be a conflict of interest.

The listed examples are not a complete list of all persons in connection with which the employee may have a conflict of interest. Each specific situation should be considered separately.

2.12. Substantial material interest

“**Substantial Material Interest**” means the direct or indirect aggregate interest of an employee or a member of his / her family in a third-party enterprise entering into or seeking to enter into transactions with the Company or being its competitor.

Minimum indicator " significant material interest "is defined as exceeding:

- 1% of circulating securities of any class of a company or corporation (“free float”);
- 10% participation in a private company, partnership or association;
- 5% of total employee assets or gross income.

2.13. Notification of a potential conflict of interest and conflict resolution

Employees are required to immediately and in details report to management of any potential conflict of interest in writing as soon as they become aware about the possibility of or about the fact of a conflict of interest.

The Company treats all notices confidentially, unless otherwise required to one degree or another to protect the interests of the Company. Management discusses relevant issues with the Compliance/Legal officer and takes actions necessary to eliminate potential conflicts.

2.14. Part-time work, external employment and other types of side activities

The following are potential conflicts of interest related to the activities of an employee outside the Company:

- Activities as a director, manager, partner, consultant, or technical specialist of any kind, or a key role in any organization, even with part-time work, if such organization concludes or seeks to enter into transactions with the Company or is its competitor.
- Acting as a broker, dealer or other intermediary of another person in transactions with the actual or potential participation of the Company or in transactions affecting its interests.



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- Additional employment, including own business, if it harms the official duties of an employee in the Company.
- Conduct presentations, writing articles or other written work relating to the professional sphere of activity of the employee. Before an employee can give consent to activities of this kind, the situation must be reported and approved by the Company's management. Also, the employee must clarify whether there is a policy for evaluating texts or presentations in its business unit. These actions should not interfere with employee performance. Any fees offered to an employee must be in accordance with the Company's policy on gifts and hospitality.
- The use of the position in the Company, in the framework of outside activities, which may involve sponsorship or support from the Company.
- Use of the property or information of the Company or its position for personal gain.
- Usage of any funds or resources of the Company as part of his\her third-party activities, if not agreed upon by the Company's management.
- The use of office time for the purpose of their third-party businesses or other activities.

Employees are obliged to discuss any potential conflict of interest situations with their supervisor before such a situation occurs, in order to prevent its transition into an actual conflict.

2.15. Insider deals

Insider information - information refers to facts including firm intentions, as yet unrealised plans and prospects. Facts external to the company, such as knowledge of a financial analysis awaiting publication, a large customer order, a licence or authorisation that is to be granted or refused or a planned terror attack, are also deemed to constitute information. Rumours and speculation, on the other hand, do not constitute information. Information must be sufficiently clear and certain that it may provide a basis for anticipating the future trend in the price of a security.

Such information is any non-public information that is material enough to disclose its effect on the value of the Company's securities, Capitalisation value or market position. Such information may include, for example, data on expected profits, mergers or acquisitions, the release of a significant new product, intellectual developments or legal proceedings.

Any person who has insider information and who knows or should know that it is insider information or who has a recommendation that he or she knows or should know is based on insider information shall behave inadmissibly when he or she:

- a. exploits it to acquire or dispose of securities admitted to trading on a trading venue in Estonia or to use financial instruments derived from such securities;
- b. discloses it to another;
- c. exploits it to recommend to another to acquire or dispose of securities admitted to trading on a trading venue in Estonia or to use financial instruments derived from such securities.



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Employees must not either conduct transactions with any securities of the Company based on insider information, nor transfer such information to other to persons who can use it for the purpose of making transactions with the securities. This restriction applies to operations with Kaurifinance OU shares, as well as shares of other companies, insider information regarding which employees may possess.

Legislation in many countries, prohibits transactions with securities when possessing insider information. Violation of insider dealing laws is subject to severe punishment.

In some jurisdictions as a rule, it must be a few working days after the official publication of insider information before employees can carry out operations with Company's shares or shares of any other company in relation to which they possess insider information. Employees must carefully consider requirements of the applicable jurisdiction in respect of the insider information.

However, employees should not carry out any market transactions, such as selling shares or changing investment options with placing Company's shares in the fund or withdrawing it from this fund as part of the Company's savings plan, or doing any others deals based on insider information which are prohibited by the special regulations¹.

If in doubt, **do not make transactions** and contact the Legal and/or Compliance Department for advice.

Senior executives are required to undergo a special preliminary assessment procedure and consult with the CEO before performing transactions with the Company's shares.

2.16. Market manipulation

Market manipulation is public dissemination of information includes in particular announcements made via the financial sector's usual information channels, the media and the internet².

A person behaves inadmissibly when he or she:

- a. publicly disseminates information which he or she knows or should know gives false or misleading signals regarding the supply, demand or price of securities admitted to trading on a trading venue in Estonia;
- b. carries out transactions or acquisition or disposal orders which he or she knows or should know give false or misleading signals regarding the supply, demand or price of securities admitted to trading on a trading venue in Estonia.

A signal falls is capable of influencing the market behavior of a reasonable investor who is familiar with the market.

Market manipulation may also involve the use of algorithmic trading programs, particularly in the context of algorithmic high-frequency trading.

¹ Art.116 General Part of the Civil Code Act

² Art. 188-15, Securities Market Act



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Anyone engaging in algorithmic trading **may not use it to give out false or misleading signals** regarding the supply of, demand for or market price of securities.

The following are examples of conduct that particularly unacceptable:

- Disseminating false or misleading information on circumstances of substantial importance for the valuation of a security (e.g. a company's earnings, orders or product pipeline or a general supply shortage).
- Disseminating false or misleading information, rumours or messages that are capable of influencing securities prices in order to exploit the resulting price movement.
- Entering low-volume purchase orders with successively higher prices in order to simulate increased demand amid rising prices (painting the tape).
- Simultaneously buying and selling the same securities for the account of one and the same beneficial owner in order to give out false or misleading signals regarding the supply of, demand for or market price of securities (wash trades).
- Entering equal but opposite buy and sell orders in the same security by prior mutual agreement in order to distort liquidity or prices (matched orders or daisy chains coordinated among a number of parties).
- Constricting the market by building up large positions (cornering) or depositing securities with third parties (parking) in order to distort securities prices (creating a squeeze).
- Buying or selling securities shortly before the exchange closes in order to influence closing prices (marking the close).
- Buying or selling securities in order to move prices (ramping) or keep them at a specific level (e.g. capping, pegging), unless this is done to stabilise prices following a public placement of securities.
- Influencing commodity prices in order to give out false or misleading signals regarding the supply of or demand for securities.
- Creating an overhang of buy or sell orders by entering large orders in the order book that are capable of influencing prices in order to influence the valuation of a security
- Placing orders in the trading system in order to create an illusion of supply or demand and then deleting them prior to execution (spoofing, layering).



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2.17. The use of official position

Working in Kaurifinance OU, employees will learn about or will participate in the creation of such opportunities about business process oriented towards the achievement of the Company's corporate goals. Employees must not abuse this knowledge. In particular, employees may not:

- ✓ Use business opportunities arising from the use of the Company's property or information or its position for personal gain.
- ✓ Directly or indirectly compete with the Company in business opportunities in which the Company is interested.

2.18. Political campaign donations

In every country where the Company operates it has limitations on political campaign donations from legal entities. Employees are required to consult the Legal Department to ensure strict compliance with applicable laws. In addition, all such donations require the approval of the Company's Compliance officer and CEO.

Employees are entitled to make personal donations to the benefit of a political party, committee or candidate, if such donation does not directly or indirectly use funds or other resources of the Company.

No one has the right to exert direct or indirect pressure on employees in any form in order to receive donations or support of a political party or political candidate.

Bringing the Company's position on political issues to the attention of governmental officials and officials may result in the responsibility of the employee and the Company for applicable propaganda and campaigning laws.

Many local, regional and national governments require the registration of political agitators, or "lobbyists," and impose severe fines for not meeting this requirement.

The definition of a "political agitator" may vary from region to region but may include virtually any interaction with government officials for business purposes.

Employees are required to consult with the Legal Department before starting official communication with government officials to find out does this require employee registration.

Employees should also contact the Legal Department if they need to involve political agitators.

2.19. Property and resources of the Company

Proper protection and rational use of the Company's assets is a fundamental responsibility of every employee. In some cases, the limited personal use of certain resources is possible, but a person who has received such a privilege should never take it for granted, and also require confidentiality regarding the use of the Company's resources for personal purposes.



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The Company's property includes tangible and intangible assets, information, data, records, and intellectual property, including trademarks, inventions, and copyrights.

Employees must fulfil the following requirements:

- **Acquisition of property:** When acquiring property for the Company, conduct a thorough and objective assessment. Acquire only the property that the Company is allowed to own.
- **Use and handling of property:** Take good care of the Company's property during work and make sure that it does not lose its value as a result of abuse or misuse.
- **Property Protection:** Protect the Company's property from abuse by others and from theft. Tangible property and information belonging to the Company should be stored in a safe place, where unauthorized access is excluded.
- **Sharing of property:** The use of the Company's property by third parties is allowed only with the presence of an appropriate permit and subject to the guarantee of the safety of property and compliance with applicable law.
- **Execution of established procedures:** Observe security programs at facilities to protect property and other assets from unauthorized use or destruction, as well as from loss as a result of a crime.
- **Disposal of property:** Disposal of the Company's assets may be carried out only with appropriate sanction, in accordance with established internal procedures, in an appropriate manner and lawfully.
- **Misuse of property:** Take good care of the property of the Company, protect it from improper or inappropriate use, acting in accordance with the approved rules and report cases of actual or possible misuse of the Company's property.

2.20. Computers and communication systems

The Company's assets include, but are not limited to, computers and related equipment and networks (including Internet access), software, telephony and voice mail systems, as well as personal electronic devices. Employees must carefully treat the specified resources and protect important Company information stored in these systems. In addition, given that computers may contain confidential information, employees are required to follow the principles and procedures approved by the Company for computer encryption and protection against theft.

Corporate standards for the security of electronic information can be found in IP Security Policy and Confidentiality and Data Protection Policy.

2.21. Confidential information

Confidential Information means all and any information concerning the Company's business and finances, including without limitation, technical procedures and intellectual property rights, its customer, client and supplier lists, including details of prospective clients; its dealings, transactions



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and affairs; its products and services; contact details of clients, customers and suppliers; information about individuals within clients, customers and suppliers; financial projections, targets and accounts; pricing policies and pricing statistics; commercial activities, product development and future plans; and similar information concerning the Company's clients, customers and suppliers, all of which information is acknowledged by the Employee to be:

- ✓ Confidential to the Company;
- ✓ Commercially sensitive in the Company's market; and
- ✓ Potentially damaging to the Company's financial stability if disclosed to a third party.

It is imperative that all employees take measures to protect such information that is not publicly available.

Confidential information of economic value to the Company is classified as a trade secret. Examples of trade secrets include the following types of information, provided that it is not publicly available: business plans, pricing and cost information, research and development plans and strategies, research data and inventions, calculation formula and indices, product formulas and ingredients, technological and project algorithms and information.

The "insider information" discussed earlier is also an example of confidential information that is not subject to disclosure to third parties without special permission.

Employees should be notified of the information that constitutes a trade secret, and make efforts to effectively protect trade secrets by complying with the GBP-15. Kaurifinance OU Confidentiality and Data Protection Policy.

In addition, all employees must protect proprietary information from unauthorized access, use or disclosure, following the principles developed by the Company.

Disclosure of trade secrets and other confidential information is permitted only on the basis of a written agreement, for example, an agreement on the disclosure of confidential information that is legally binding and applies to this particular case and is properly approved by management of the Company.

When transferring confidential information and samples to another person, they should be marked "Confidential". In addition, disclosure should be limited to the information necessary to achieve the goal of cooperation. Before signing a confidentiality agreement proposed by the other party, or receiving relevant information, employee should say that we are using our template of NDA and the Legal Department should review any such NDA agreement by third party.

2.22. Information classification

Information is divided into the following categories:

- a. **Confidential information with special control** - information of the highest degree of confidentiality. If you lose this information, the Company, its reputation or its financial situation may suffer irrecoverable damage. Such information includes, for example, income



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reports, various types of research and development information, rules for the application of certain production technologies, new projects, forecasts and business strategies.

- b. **Confidential information** - information of a high degree of confidentiality, due to its relevance at this particular point in time, the financial consequences of its use or the content of personal data. It can be transmitted only to those persons who need access to this information for business purposes. This category includes, in particular, its own financial or technical information, information on commercial purposes, marketing plans, employment contracts, data on organizational changes and individual employee benefit plans.
- c. **For internal use** - Information that is not publicly available. It includes, for example, technology standards, technical information used by sales representatives and not intended for customers, general information on business connections and correspondence.
- d. **Publicly available** - Developed specifically for customers, shareholders and the media or for public distribution for other purposes. Such information includes annual reports, material safety data sheets (if any), licences and advertising products.

2.23. Inventions

An invention is any new and useful development, for example, a composition, technology, method or device. Similar to a trade secret, inventions can become a competitive advantage for Kaurifinance OU. Employees must effectively safeguard the Company's inventions.

One of the measures to protect the Company's inventions may be the filing of patent applications, but its effectiveness depends on the competitive environment relevant to the Company in connection with this invention.

Employees must help the Company to prevent infringement of patents of others. Before releasing a new product or introducing a new technological process, the responsible department or official should contact the Legal Department with a request to conduct an appropriate patent analysis.

2.24. Trademarks and Copyright

For the protection of intellectual property that becomes well known, the Company uses trademarks, patents and copyrights. For example, the Kaurifinance OU brand is one of the Company's most important assets, and employees must make efforts to preserve their value.

To protect brands, trademarks and copyrights, Company's employees must:

- Familiarize himself with the Company's trademarks and use them correctly.
- Have an idea about the possible abuse of Company's brands by colleagues, customers, suppliers and competitors, as well as on the Internet.
- To bring any cases of brand abuse or brand infringement to the attention of Company's Legal Department.



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In addition, employees must respect the registered trademarks and copyrights of others and use them properly, including when copying and distributing materials, as well as when using computer programs.

2.25. Documentation and reporting

Any information generated by the Company is considered to be a record, regardless of how it is stored. Examples of records include financial, accounting, technical and sales reports, product details, employee records, health, safety and environmental information, contracts, marketing information, and business plans, etc.

Employees should take measures to ensure that all Company records and other records:

- were accurate and clearly described and identified the relevant facts or the true nature and origin of commercial transactions, assets, debentures or own funds;
- were documented in such a way as to correctly and timely classify and make entries to accounting logs in accordance with the accounting principles adopted by the Company.

Records related to accounting operations and financial statements must comply with the Company's accounting policies and generally accepted accounting principles (GAAP).

Employees must comply with policy management of information flows within the corporate office and require the same compliance on the part of contractors and consultants in the creation, maintenance or destruction of Company's records. Employees under no circumstances should intentionally enter falsified, distorted, misleading, incorrectly addressed or obviously incomplete data or omit any significant data when making records.

Improper accounting and documentation and falsification of financial statements will violate corporate policies and legal and regulatory accounting standards. As a result of such actions, both the Company and the responsible officer may be brought to a civil and criminal liability.

Many categories of records are governed by laws and regulations, for example, health and safety standards and accounting standards, trading requirements. The Company's Accounting and Reporting Policy stipulated by the Company systematizes the specified regulatory requirements in order to manage the Company's document flow. Also, the policy contains requirements for the control of records that are not regulated by any standards. In the event of such inconsistencies, employees should consult with the Legal and Finance departments.

The standards and internal control procedures adopted by the Company are designed to ensure protection and proper use of the Company's assets, as well as the accuracy and reliability of financial records and reports. Employees are jointly responsible for enforcing the necessary internal controls and compliance with applicable laws and regulations.

2.26. Expense reports and reimbursement

Travel and entertainment expenses of employees must be consistent with the needs of the business and comply with the Company's policies and procedures. The intention of the Company is to



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ensure that the employee does not suffer financial losses and does not receive financial profits as a result of business trips and representative events. Employees are expected to spend their money as prudently as their own.

Employees who report travel expenses and representation expenses or approve such reports are responsible for:

- expenses were appropriate and reasonable;
- expense reports have been issued and properly presented;
- checks and explanations to the extent necessary and sufficiently confirmed with the supporting documentation.

2.27. Dismissal from the Company

Upon termination, employees are required to:

- immediately return all of the Company's property, including physical materials and informational tools, in particular, computers, mobile phones, phone cards, access cards, keys, business cards and electronic media, etc;
- do not copy / keep any copies of any information;
- not to disclose Company's secret information to other persons even after being dismissed.

Failure to comply with these obligations may entail serious administrative or criminal penalties.



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3. PUBLIC AFFEARS

3.1. General information about interaction with government officials

If the business is conducted with the state/government structures of a country, the employees should understand what rules are adopted in the state structures of the particular country.

In some countries there are strict restrictions on gifts or hospitality for officials, and companies that violate them are subject to severe sanctions. Handing a government official even a modest gift or paying an inexpensive lunch can be considered unacceptable or illegal, and they are more likely to be declared a bribe or a "kickback" even if there was no intention to influence this or that action.

Employees should always consult with the Legal Department in advance about possible interactions to government officials.

3.2. Environmental protection and responsible environmental management

Kaurifinance OU's mission is sustainable growth - creating value for shareholders and society and at the same time reducing the environmental impact in all areas of our business and ensuring sustainable growth. The Company in its activities considers respectful and caring attitude to the environment.

The Company endeavours to promote the efficient use of resources and address sustainability issues when managing risks.

Responsibility for the fulfilment of the Company's obligations, as well as the applicable laws in the field of environmental protection, rests with each employee.

The management of each of the structural units is obliged to inform, train and motivate employees in such a way that they understand the content of our commitment.

Each employee must comply with Company's principles, standards and instructions in the field of occupational safety, health and the environment.

3.3. Contact with third parties

The Company seeks to ensure that the information the Company disseminates regarding its business is accurate and comprehensive.

Only authorized persons should talk on behalf of the Company with journalists, analysts in the field of research, government officials or law enforcement officials, as well as with other third parties. If the employee does not have prior permission to discuss the Company's affairs with third parties, the employee is obliged to send any inquiries from such persons to authorized Company's manager (e.g. PR employee).

In addition, employees should not pass non-public information to persons not associated with the Company, without confirmed official need and appropriate permission from the Company's management, especially if the recipient of the information can provide its widespread.



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4. PERSONAL PRIVACY AND NON-DISCRIMINATIONS

4.1. Respect for people

Kaurifinance OU can realize its Goal only with the full commitment of our diverse staff and the presence of team spirit.

We can achieve success only through mutual respect, understanding the value of the contribution of each of us and fair treatment of each employee.

4.2. Equality of opportunity and non-discrimination

The Company does not allow discrimination against employees or applicants due to their age (subject to legal requirements), race, religious belief, colour, sex, disability, nationality, origin, marital status, sexual orientation, gender identity or severity, or veteran status in any conditions or requirements in an employment relationship, including in terms of employment, promotion or demotion, transfer to another position, recruitment, termination of employment wage rates or other forms of compensation, as well as selection for training.

4.3. Avoidance of persecution

The Company does not allow any kind of persecution. Persecution or harassment may improperly affect employee performance or lead to a negative working atmosphere based on threats or insults.

Persecution can include abusive or derogatory comments, offering advantages at work in exchange for sexual favours, and other forms of abusive behaviour.

Harassment may include behaviour directed at / by Company's employee either an employee of the client company or supplier, or other business partners. The improper use of computers and communications by the Company also includes participation in sexual, racial or other harassment and discrimination, as well as access to sexually-oriented and other inappropriate materials. Inappropriate use of the Company's electronic communications, regardless of the carrier, is considered a serious violation, and violators will be subject to disciplinary action.

Employees who are aware of the alleged discrimination or harassment should report this to the HR Department and management of the Company or through the whistleblowing system.

4.4. Privacy and personal data

The Company values every employee and respects his/her privacy. The Company seeks to ensure reasonable protection of the privacy of the Company's employees, including former ones, as well as the protection of personal data that can be identified that the Company has.

The Company informs employees about what kind of personal information the Company collects and how this information can be used/to whom transferred, in particular, for such purposes as



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personnel administration, payment of compensation and benefits, as well as for security and access to computer systems.

Employees are required to comply with relevant corporate policies and procedures in order to protect personally identifiable information in accordance with the Kaurifinance OU Confidentiality and Data Protection Policy and applicable local laws.

4.5. Personal use of the Company's property

Remember that systems, equipment and services, including premises, telephones and computer equipment, are intended for official use only. This also applies to e-mail, voice messaging, access to the Internet and to the intranet. Employees do not have the right to rely on ensuring confidentiality when they use these systems and equipment. In order to protect the security and reputation of the Company and its employees, to prevent criminal acts, and to protect information the Company reserves the right to monitor workplaces and communications, as well as to audit the Company's property in accordance with applicable law. Any specified means of communication, information or materials may also be transferred to law enforcement authorities in the framework of cooperation or on the basis of a decision of a court or law enforcement authorities.

4.6. Occupational safety and health

The Company is convinced that all injuries, occupational diseases, accidents at work and environmental accidents are preventable. The Company's goal is to reduce such incidents to zero. We are also interested in improving security during off-hours.

Fulfilment of the Company's internal policies and procedures and applicable legislation in the field of occupational safety and health is the responsibility of each employee.

The management of each unit is responsible for informing, training and motivating employees so that they understand the content of the Company's internal policies and procedures and all applicable laws and comply with them.